



MICHAEL B. MIROTZNIK  
STEPHEN F. DODDATO

OF COUNSEL:  
MARY ELLEN O'BRIEN  
STEVEN M. SACK  
MELVYN K. ROTH

June 11, 2020

**VIA ECF**

Hon. Vernon S. Broderick  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Cauchi v. 601 West End Tenant's Corp., et al.  
Case No.: 1:19-cv-10717

Dear Judge Broderick:

I represent Plaintiff Michel Cauchi in the above captioned matter. I submit this letter on behalf of both parties in the above-referenced matter to respectfully request that the Court briefly extend Plaintiff's time to file opposition to Defendant's Motion to Dismiss Plaintiff's Amended Complaint which was filed April 10, 2020, and set down a briefing schedule and return date for the motion. The parties jointly make this application.

On May 28, 2020, this Court issued an Order granting our joint request, which was first filed May 25, 2020, to extend the briefing schedule as we had advised the Court that there have been fruitful settlement negotiations. Counsel for Defendants, Mr. Goldberg and I, have continued to negotiate and discuss this matter and the pending motion. We have made significant progress in our settlement discussions. As such, we respectfully request that Your Honor permit another brief extension of time to allow the parties to continue to negotiate towards a settlement. We believe we are close to a settlement and are continuing to finalize the details to bring about a resolution to the matter which would obviate the need for a full briefing and decision of the motion.

In case the parties are unable to settle the matter, we are proposing that the Plaintiff file and serve opposing affidavits and memoranda on or before June 24, 2020 and any reply submission be filed and served on or before July 6, 2020.

Thank you for your anticipated courtesies.

Respectfully submitted,

/s/ Stephen Frank Doddato

By: Stephen Frank Doddato  
Mirotznik & Associates, LLC  
2115 Hemsstead Turnpike  
East Meadow, NY 11554  
T: 516-794-8827  
F: 516-794-7971  
Email: [stephen@mirotzniklaw.com](mailto:stephen@mirotzniklaw.com)

*Counsel for Plaintiff*

/s/ Jerrold Foster Goldberg

By: Jerrold Foster Goldberg  
Greenberg Traurig, LLP  
200 Park Avenue  
New York, NY 10166  
T: 212-801-9209  
F: 212-805-9209  
Email: [GoldbergJ@gtlaw.com](mailto:GoldbergJ@gtlaw.com)

*Counsel for Defendants*